

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,**

**Plaintiff,**

**v.**

**MASSEY SERVICES, INC.,**

**Defendant.**

**C.A. No. 2:19-cv-00263-RMG-MGB**

**JOINT MOTION FOR ENTRY OF  
CONSENT DECREE**

Plaintiff U.S. Equal Employment Opportunity Commission and Defendant Massey Services, Inc. respectfully move this Court to enter the attached Consent Decree.

Respectfully submitted this the 17<sup>th</sup> day of December, 2019.

**WE SO MOVE:**

**U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION**

SHARON FAST GUSTAFSON  
General Counsel

JAMES L. LEE  
Deputy General Counsel

GWENDOLYN YOUNG REAMS  
Associate General Counsel

ANTONETTE SEWELL  
Regional Attorney  
Atlanta District Office

LAKISHA DUCKETT ZIMBABWE  
Supervisory Trial Attorney  
Atlanta District Office

Keyana C. Laws (*pro hac vice*)  
Senior Trial Attorney

**WITH CONSENT OF:**

**MASSEY SERVICES, INC.,  
Defendant**

J. Scott Hudson, Esq. (*pro hac vice*)  
shudson@zkslawfirm.com  
Kevin P. Robinson, Esq. (*pro hac vice*)  
krobinson@zkslawfirm.com  
ZIMMERMAN, KISER & SUTCLIFFE, P.A.  
315 East Robinson Street, Suite 600  
Orlando, Florida 32801

**s/ Molly Hughes Cherry**

Molly Hughes Cherry, Esq.  
Fed ID No. 7067  
NEXSEN PRUET, LLC  
205 King Street, Suite 400 (29401)  
P.O. Box 486  
Charleston, South Carolina 29402  
Phone: 843.577.9440  
Facsimile: 843.414.8209  
MCherry@nexsenpruet.com

Atlanta District Office  
100 Alabama St., SW, Suite 4R30  
Atlanta, Georgia 30303  
Telephone: (404) 562-6823  
Facsimile: (404) 562-6905  
keyana.laws@eoc.gov

**ATTORNEYS FOR DEFENDANT**

**s/ Rachael S. Steenbergh-Tideswell**

RACHAEL S. STEENBERGH-TIDESWELL  
South Carolina Federal Bar No. 10867  
Senior Trial Attorney  
Charlotte District Office  
129 West Trade Street, Suite 400  
Charlotte, North Carolina 28202  
Telephone: (980) 296-1274  
Facsimile: (704) 954-6412  
Email: rachael.steenbergh@eoc.gov

**ATTORNEYS FOR PLAINTIFF**